

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

John Doe,

Court File No. 16-cv-1127 (JRT/DTS)

Plaintiff,

v.

**DECLARATION OF BEAU D.
MCGRAW**

University of St. Thomas,

Defendant.

I, Beau D. McGraw, declare under the penalties of perjury the following to be true to the best of my knowledge:

1. I am the attorney for Plaintiff in the above captioned matter.
2. I have personal knowledge of the facts herein.
3. Attached here to as Exhibit 1 is a true and correct copy of Plaintiff's UST Sexual Misconduct Policy and Procedures.
4. Attached as Exhibit 2 is a true and correct copy of the Deposition of Nora Fitzpatrick.
5. Attached as Exhibit 3 is a true and correct copy of the Deposition of Brad Pulles.
6. Attached as Exhibit 4 is a true and correct copy of the Deposition of Vernon Klobassa.
7. Attached as Exhibit 5 is a true and correct copy of the Deposition of Jean Geibenhain.

8. Attached as Exhibit 6 is a true and correct copy of the Deposition of Linda Baughman.
9. Attached as Exhibit 7 is a true and correct copy of the Deposition of Karen Lange.
10. Attached as Exhibit 8 is a true and correct copy of a document provided by Defendant entitled Summary of Title IX Cases Spreadsheet 2013-2015 (Bates 7758).
11. Attached as Exhibit 9 is a true and correct copy of a document provided by Defendant entitled UST Fact Finders by Rachel Harris, May 13, 2015 (Bates 4418).
12. Attached as Exhibit 10 is a true and correct copy of a document provided by Defendant entitled UST Factfinders, by Rachel Harris, January 7, 2015 (Bates 4601).
13. Attached as Exhibit 11 is a true and correct copy of a document provided by Defendant entitled UST Factfinders & Process Advisor Training: Writing Investigative Reports, Abigail Crouse and Rachel Harris, December 9, 2015 (Bates 4887).
14. Attached as Exhibit 12 is a true and correct copy of a document provided by Defendant entitled Recognizing and Working with Stalking Victims by Deirdre Keys (Bates 4995).
15. Attached as Exhibit 13 is a true and correct copy of a document provided by Defendant entitled Campus Dating Violence (Bates 6427).

16. Attached as Exhibit 14 is a true and correct copy of a document provided by Defendant entitled Strengthening the Response to Sexual Violence, by Roberta Gibbons and Peter J. Meagher (Bates 5120).
17. Attached as Exhibit 15 is a true and correct copy of a document provided by Defendant entitled Campus Checklist (Bates 5334).
18. Attached as Exhibit 16 is a true and correct copy of a document provided by Defendant entitled Sexual Misconduct Policy Appeal Process, by Nora Fitzpatrick dated March 16, 2016 (Bates 3553).
19. Attached as Exhibit 17 is a true and correct copy of a document provided by Defendant entitled Additional Case Studies (Bates 5461).
20. Attached as Exhibit 18 is a true and correct copy of the Fact Finder Report (Bates 1312).
21. Attached as Exhibit 19 is a true and correct copy of an email from Dean of Students to Plaintiff dated December 14, 2015.
22. Attached as Exhibit 20 is a true and correct copy of an email from Dean of Students to Plaintiff dated December 15, 2015.
23. Attached as Exhibit 21 is a true and correct copy of a letter from Dean of Students to Plaintiff dated February 20, 2016.
24. Attached as Exhibit 22 is a true and correct copy of the Deposition of Sharon Howell.
25. Attached as Exhibit 23 is a true and correct copy of the Deposition of Abigail Crouse.

26. Attached as Exhibit 24 is a true and correct copy of an October 24, 2017 email from Beau McGraw to Maren Grier.

27. Attached as Exhibit 25 is a true and correct copy of the Affidavit of [REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 6/20/18


Beau D. McGraw